



USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 4/16/2021

JAMES E. JOHNSON
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

LAURA C. WILLIAMS
Labor & Employment Law Division
Phone: (212) 356-2435
Fax: (212) 356-2439
lawillia@law.nyc.gov

MEMO ENDORSEMENT

April 15, 2021

BY ECF

Honorable Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street, Room 24A
New York, New York 10007

Re: Marina Brown v. New York City, et al.
Civil Action No.: 20-cv-10948 (CM)

Extension Granted.

Laura Williams
4/16/2021

Dear Judge McMahon:

I am the Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, assigned to represent defendants City of New York (“City”) and the New York City Department of Education (“DOE”) (collectively, “Defendants”) in the above-referenced action. I write to respectfully request, with the consent of Plaintiff’s counsel, a one-week extension of time, from April 19, 2021 to April 26, 2021, for Defendants to respond to the complaint. Defendants previously requested, and the Court granted, extensions of time from January 28, 2021 to March 15, 2021, from March 15, 2021 to April 5, 2021, and from April 5, 2021 to April 19, 2021. An Initial Pretrial Conference is currently scheduled for April 30, 2021 at 10:00 a.m.

This additional extension request is made due to the undersigned’s very heavy caseload, which includes deposition preparation, a motion to dismiss in another action, as well as preparing responses to federal and state discovery requests in multiple actions. The foregoing obligations necessitate such additional time to finalize Defendants’ response.

cc: Ethan Leonard, Esq. (by ECF)
The Law Offices of Neal Brickman, PC
Attorneys for Plaintiff

Thank you for your consideration of this matter.

Respectfully Submitted,

/s/
Laura C. Williams
Assistant Corporation Counsel